

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF MARYLAND

3       MELVIN NEWSOME, et al.

4                   Plaintiffs

5                   vs.

6       UP-T0-DATE LAUNDRY, INC.,           CIVIL ACTION

7       et al.                               NO. S01-2257

8                   Defendants

9       \_\_\_\_\_/

10                   The deposition of JOSEPH LLOYD was held on  
11       Friday, March 21, 2003, commencing at 10:11 A.M. at  
12       the law offices of Whiteford, Taylor & Preston, LLP,  
13       Seven Saint Paul Street, Baltimore, Maryland  
14       21202-1626, before Sandra A. Slater, Notary Public.

15       APPEARANCES:

16                   PHILIP J. SIMON, ESQUIRE  
                    On behalf of Plaintiffs

17                   JEANNE M. PHELAN, ESQUIRE  
18                   On behalf of Defendants

19       Also Present:   Bradley Minetree

20

21       REPORTED BY:   Sandra A. Slater, RPR, CSR

                    GORE BROTHERS  
                    Reporting & Video Co., Inc.  
                    410-837-3027

1 that it calls for him to make a legal conclusion about  
2 the claims that he has asserted in the lawsuit but.

3 MS. PHELAN: Well, Mr. Simon, we are here  
4 to find out about his claims and if he can't assert  
5 them it impedes the discovery process so.

6 Q Were there any other complaints that you  
7 had other than the difference in hourly wages and how  
8 you were being treated by Brad and David?

9 A Harassment.

10 Q Excuse me?

11 A The harassing, the harassing, how they  
12 treat me.

13 Q Is that different than the how you are  
14 being treated by Brad and Dave?

15 A Yes.

16 Q What's the harassment? Tell me what that  
17 is.

18 A When I was working on the machine Dave  
19 came behind me and he start humping up on my back and  
20 I asked him was he crazy and Bradley he called me  
21 names like you dumb mother fucker. Should I say that?

1 Q Yeah.

2 MR. SIMON: Yes, it's all right to say  
3 that.

4 Q Yeah, you need to say whatever was said.

5 A And how he called us -- me a black stupid  
6 mother fucker, how I goes on my lunch break and he  
7 squeezes my nipples. Dave squeezed my nipples. And  
8 Ms. Nancy say that's why the Latinos -- she would  
9 rather pay the Latinos more than the blacks because  
10 the blacks all they want to do is get high and then  
11 don't want to work. And then Brad called me a Kunta  
12 Kunta and then smiles at me when he said it.

13 Q He calls you what?

14 A Kunta Kunta. Kunta Kinte.

15 Q What was it he called you?

16 A That's the words that he would say and  
17 then he would laugh at me.

18 Q What words was it that he would say?

19 A Kunta Kinte you dumb black ass, you black  
20 mother fucker.

21 Q Did you understand what he meant by the

1 Kunta Kinte?

2 A Yes, I did.

3 Q What did you understand that to mean?

4 A And he called my a dumb ass nigger.

5 Q What is Kunta Kinte?

6 A I don't know what that -- I only seen the  
7 movie of that and then --

8 Q You did see the movie?

9 A Yeah.

10 Q What does it mean? Who was Kunta Kinte?

11 A Kunta Kinte was a black guy.

12 Q Do you know anything about him other than  
13 the fact he was a black guy?

14 A They cut his toes off, when he tried to  
15 escape they beat him with a whip and they made him say  
16 his name, that wasn't his name.

17 Q What does that mean?

18 A As they was beating him they was telling  
19 him to say Kunta Kinte.

20 Q Did you ever talk with Brad about that  
21 movie?

1           A       Bradley would get upset and mad when the  
2     work ain't out at a certain time and he would get  
3     violent when machines break down. Dave, he goes  
4     around feeling on people, picking on people and he  
5     have a nasty attitude. I seen Dave and Brad fight one  
6     time. Even Dave brought a gun to the factory.

7           Q       Did you see the gun?

8           A       I seen part of it.

9           Q       Where did you see it?

10          A       The handle part.

11          Q       Where did you see it?

12          A       By the loading dock.

13          Q       Where was the gun at that point?

14          A       It was in his side.

15          Q       In his what?

16          A       In his side.

17          Q       In whose side?

18          A       In his dent, in his side, down in his  
19     pants.

20          Q       In Dave's --

21          A       Yeah.

1 to him. I was working on the press during that time.  
2 He started calling me mother fucker, dumb ass, why did  
3 I let Santo stop the tunnel up. I told him why are  
4 you yelling at me. That man is the one that stopped  
5 the tunnel up. Then he started calling me a black  
6 ass, mother fucker, dumb ass, bitch. At that point I  
7 got mad and I left but he send Mike Ashley at my house  
8 to have me come back to the factory and apologize to  
9 me. I heard him call Howard dumb black mother fuckers  
10 because --

11 Q Before we talk about Howard let's talk a  
12 little bit more about this first incident. When did  
13 this happen?

14 A At the old plant.

15 Q How long ago?

16 A Late part of '98.

17 Q And you said you got mad and left. You  
18 left during your shift?

19 A No, I left maybe ten minutes before my  
20 shift was over because I was so hurt of what he was  
21 saying to me.

1 apologized?

2 A Yes.

3 Q Did you go back to work?

4 A The next day, yes.

5 Q You were telling me about a situation  
6 involving Howard White. Tell me what happened.

7 A Howard White was slow in doing the clothes  
8 and Brad got upset because Howard like wasn't getting  
9 the clothes out fast enough. Then he started calling  
10 Howard White dumb black mother fucker, what's taking  
11 you so long with these clothes?

12 Q Where were you working then?

13 A I was working on the tunnel. Pardon me, I  
14 was working on the press.

15 Q When you say Howard White was slow doing  
16 clothes was he always slow doing clothes or was he  
17 particularly slow that day?

18 A He was at his normal speed.

19 Q What happened after Brad made that  
20 comment?

21 A I just looked at Howard and he was so

1 Q Was anybody else there?

2 A Working at the plant?

3 Q Other than her and Brad in the  
4 conversation?

5 A I didn't go in the office. She said it  
6 was two persons in there, Brad and another supervisor.

7 Q Were there other people in the plant?

8 A Yes.

9 Q Other than that comment and the ones we  
10 have talked about, the other ones I gave you the list  
11 of right before that, were there any other situations  
12 where you saw or heard Brad do something racial?

13 MR. SIMON: Continuing objection. It  
14 mischaracterizes his testimony.

15 A No.

16 Q Now, you say that other people told you  
17 that they had heard or seen things?

18 A Yeah.

19 Q Tell me what you heard from other people.

20 A One guy in the soil room told me that  
21 Bradley calling him dumb ass mother fucker, black



1 mother fuckers and at the old plant by it's so small  
2 you can hear when Brad cusses somebody out. You can  
3 be way in back of where the pads at you can hear him  
4 screaming and cussing and calling people assholes,  
5 dumb mother fuckers, niggers and everybody just pay  
6 attention to him because that's how loud he be.

7 Q Did you hear this?

8 A Yeah.

9 Q When the person was telling you about the  
10 soil room incident?

11 A Yeah. You cannot help from hearing when  
12 Brad get mad and angry. You cannot help from hearing  
13 the things that he said because he said it so loud the  
14 whole factory hear it.

15 Q In that old factory did you ever hear him  
16 get mad at anybody who was Hispanic?

17 A Only blacks.

18 Q You never heard him curse anybody who was  
19 Hispanic?

20 MR. SIMON: Objection. Asked and  
21 answered.